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February 24, 2005

**CERTIFIED MAIL-RETURN RECEIPT REQUESTED**  
**AND VIA FACSIMILE**

Jeff S. Jordan  
Supervisory Attorney  
Complaints, Examination and Legal Administration  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

Re: MUR 5637  
Matt Entenza

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2005 MAR -1 A 10 21

Mr. Jordan:

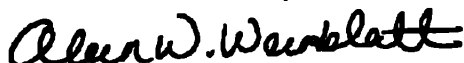
I represent Matt Entenza, Respondent in the above referenced MUR. My Notice of Representation is of Record. This letter is submitted as Mr. Entenza's response to the Complaint to the Commission of Tony Trimble dated December 20, 2004 and your letter to Mr. Entenza dated January 14, 2005.

Mr. Entenza made three contributions to 21<sup>st</sup> Century Democrats in 2004. The first was made by check number 8650 dated July 1, 2004, a copy of which is attached. In the "memo" section of the check Mr. Entenza wrote "Youth Voter" as a statement of his intent that the contribution was intended to be made to the 21<sup>st</sup> Century Democrats' non-federal Youth Voter project. The other two contributions, made by wire transfer on August 10 and October 5, 2004, were likewise intended to be made solely to that non-federal project.

Mr. Entenza's three contributions were all based on information given to him by the 21<sup>st</sup> Century Democrats and his resulting belief that the money was to be used solely and exclusively for non-federal purposes. He did not intend that any portion would be used for federal election activity as that term is defined by the Federal Election Campaign Act as amended by the Bipartisan Campaign Reform Act. He did not intend that any portion be used to support any candidates for federal office, nor any specific state or local candidate.

In addition, Mr. Entenza's review of the 21<sup>st</sup> Century Democrats website indicated to him that several other persons had contributed similar (or larger) amounts to the same organization for non-federal purposes. He believed (and still does) that 21<sup>st</sup> Century Democrats was an organization fully qualified under Section 527 of the Internal Revenue Code and not subject to the limitations of the FECA and BCRA.

My client remains fully willing to cooperate with any further Federal Election Commission review of the matter; and requests that the commission determine that there is no reason to believe that he violated any provision of federal law.



ALAN W. WEINBLATT  
FOR  
WEINBLATT & GAYLORD, PLC

AWW:kg

Encl.

cc: Matt Entenza

28044221211

JULY 2, 2004


KELLY YOUNG  
EXECUTIVE DIRECTOR  
21<sup>st</sup> Century Democrats

*Kelly*  
Dear Mr. Young,

Thanks for your solicitation for the Youth Voter program. Please find my contribution enclosed. Thanks for your hard work and the excellent work done for our youth by 21<sup>st</sup> Century Democrats.

Yours sincerely,

*Matthew K. Entenza*  
Matthew K. Entenza

MATTHEW K. ENTENZA		8650
SAINT PAUL, MN 55104-0000		DATE 7-1-04
PAY TO THE ORDER OF 21 <sup>st</sup> Century Democrats Youth Voter \$100,000.00		
One Hundred Thousand		DOLLARS
 St. Anthony Park Bank	Matthew K. Entenza	
MEMO: YOUTH VOTER		